

The remainder of the monies (\$850,000) will be placed in an endowment to broaden and expand the programming offerings of KTSC-TV. For the past four years KTSC-TV has attained the financial ability to provide the entire PBS roster of programming, but not programming commonly purchased beyond the PBS offerings. With the entry to communities like Grand Junction and Durango and the additional interest monies from the endowment provided by the KOAA-TV contribution, many of the additional programs that are requested by viewers may finally be included in the KTSC-TV schedule. We are projecting up to \$50,000 in income each year be directed towards programming efforts. KTSC-TV is also the leader in local programs, offering more local programming per week (outside of local news) than any other station in the market. The following series exemplify this effort:

STANDOFF -- the region's only live prime timed public affairs series incorporating a studio audience and live viewer call-ins;

MATCHWITS -- the regional high school knowledge bowl;

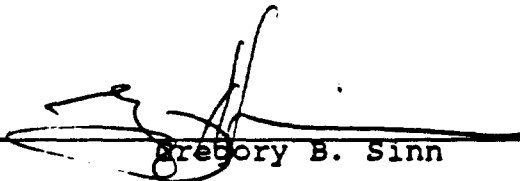
COLORADO HEALTH VIEW -- live with viewer call-ins regarding health matters;

CAPITAL JOURNAL -- covering the Colorado legislature from a regional perspective. These series are complimented with award winning documentaries that also tell the story of our area. KTSC-TV has a commitment to providing an opportunity for local issues to be addressed in a public forum. Discussion and examination of those topics that are important to the residents of southern and western Colorado has proven to be greatly appreciated. The selection of KTSC-TV as the PBS station to go to the Western Slope was decided by the County Commissioners of

Ouray, Delta and Montrose, Colorado, upon comparison of what KTSC-TV was providing in the way of a local voice for its viewers. This responsiveness to viewers was a major factor in KTSC-TV being selected over much larger KRMA-TV, Denver, in being carried on the Western Slope system. The endowment monies will also be used to expand and enhance the local programs KTSC-TV can offer regarding the smaller communities that generally do not get as much television exposure.

STATE OF
COUNTY OF PUEBLO } ss:

Subscribed and sworn to this 3rd day of September 1992.



Gregory B. Sinn

EXHIBIT 2

Engineering Statement of Cohen, Dippell & Everist, P.C.

**ENGINEERING STATEMENT
IN SUPPORT OF AMENDMENT OF 73.606
TABLE OF ASSIGNMENTS TO DESIGNATE
CHANNEL 8, PUEBLO, COLORADO
AS A COMMERCIAL CHANNEL AND
CHANNEL 5, PUEBLO, COLORADO
AS A NON-COMMERCIAL CHANNEL
SEPTEMBER 1992**

**COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.**

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

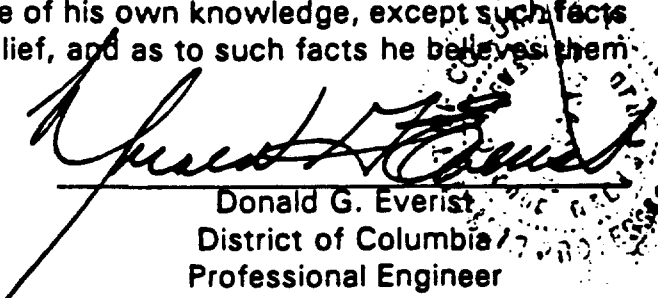
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is Secretary-Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.


Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 4th day of September 1992.


Notary Public

My Commission Expires: 2/28/93

This engineering statement is prepared on behalf of The University of Southern Colorado, permittee of non-commercial television station KTSC(TV), Channel 8, Pueblo, Colorado (hereafter "University") and Sangre de Cristo Communications, Inc., licensee of television station KOAA-TV, Channel 5, Pueblo, Colorado (hereafter "SCC") in support of a petition to: (1) designate Channel 8, Pueblo, Colorado, as a commercial channel and designate Channel 5, Pueblo, Colorado, as a non-commercial channel and (2) modify the license of KTSC(TV) to specify operation on Channel 5*, and modify the license of KOAA-TV to specify operation on Channel 8 in accord with an existing construction permit held by University.

SCC proposes (1) to make a monetary contribution to University of \$1,000,000, (2) donate the license of K30AA Channel 30 translator at Colorado Springs, Colorado, to University, and (3) donate the existing licensed facilities of KOAA-TV to University.

University proposes to use a portion of the contribution to provide the first educational service to the western slope of Colorado which contains 10 counties and a population of 207,974. See Sinn affidavit. (With the use of two translators, University will be able to provide the first educational service to 82,871 persons. See Appendix A).

The K30AA translator serves 340,260 persons within its 74 dBu contour, a gain of 211,633 over the STA operation of the K15BX translator by University. In addition, the K30AA transmitter and antenna operates with state-of-the-art equipment

and provide both horizontally and vertically polarized service to the Colorado Springs area.

The KOAA-TV transmitter and antenna will permit University to make a significant improvement of quality signal within its service area as the licensed operation of KOAA-TV is for an omni-directional circularly polarized (Harris CPV) antenna with 100 kW ERP in each polarization.

Attached hereto are separate coverage maps for:

- 1) The licensed operation of KOAA-TV, Channel 5, 100 kW, 396 meters circularly polarized.
- 2) The licensed operation of KTSC(TV), Channel 8, 316 kW, 372 meters.
- 3) The construction permit of KTSC(TV), Channel 8, 234 kW (max DA) 727 meters.

The proposed (C.P.) operation KTSC(TV) would provide Grade B service to 1,748,151 people, a theoretical gain of 1,149,537, mainly in the Denver, Colorado, which presently receive non-commercial service from three other non-commercial stations (KRMA-TV, Channel 6, Denver; KBDI-TV, Channel 12, Broomfield; and KWBI-TV, Channel 41, Denver). This gain of service in the Denver area does not occur. There is intervening mountainous terrain between the proposed KTSC(TV) site and Denver. The proposed move would result in a loss of service to 19,597 persons. This loss of non-commercial service was briefly referred to in the Commission's letter of February 28, 1991, to University as being largely unpopulated when it stated, "We

further note that while there would be some loss areas to the south and east, these areas are largely unpopulated."

COHEN, DIPPELL AND EVERIST, P. C.

POPULATION SUMMARY
KOAA-TV CHANNEL 5
KTSC(TV) CHANNEL 8
AUGUST 1992

<u>Station</u>	<u>Contour</u>	<u>Population</u>
KOAA-TV	Grade B	604,012 ^{1/}
KTSC(TV) Lic.	Grade B	598,614 ^{2/}
KTSC(TV) C.P.	Grade B	1,748,151 ^{3/}
K30AA ^{4/}	74 dBu contour	340,260
KOAA-TV-KTSC(TV) Lic.	Grade B Overlap	598,614
KOAA-TV-KTSC(TV) C.P.	Grade B Overlap	582,140
KTSC(TV) Lic.-KTSC(TV) C.P.	Grade B Overlap	597,037
KTSC(TV)	Loss with implementation of C.P.	19,599 ^{5/}
KTSC(TV)	Gain moving to Channel 5	5,393
	K30AA Translator Gain	211,633
	Total Gain	217,026
KOAA-TV	Loss moving to KTSC(TV) C.P.	21,872

^{1/}There is shadowing in Colorado Springs from the KOAA-TV/KTSC(TV) licensed site and thus a portion of this area needs to be served by a translator.

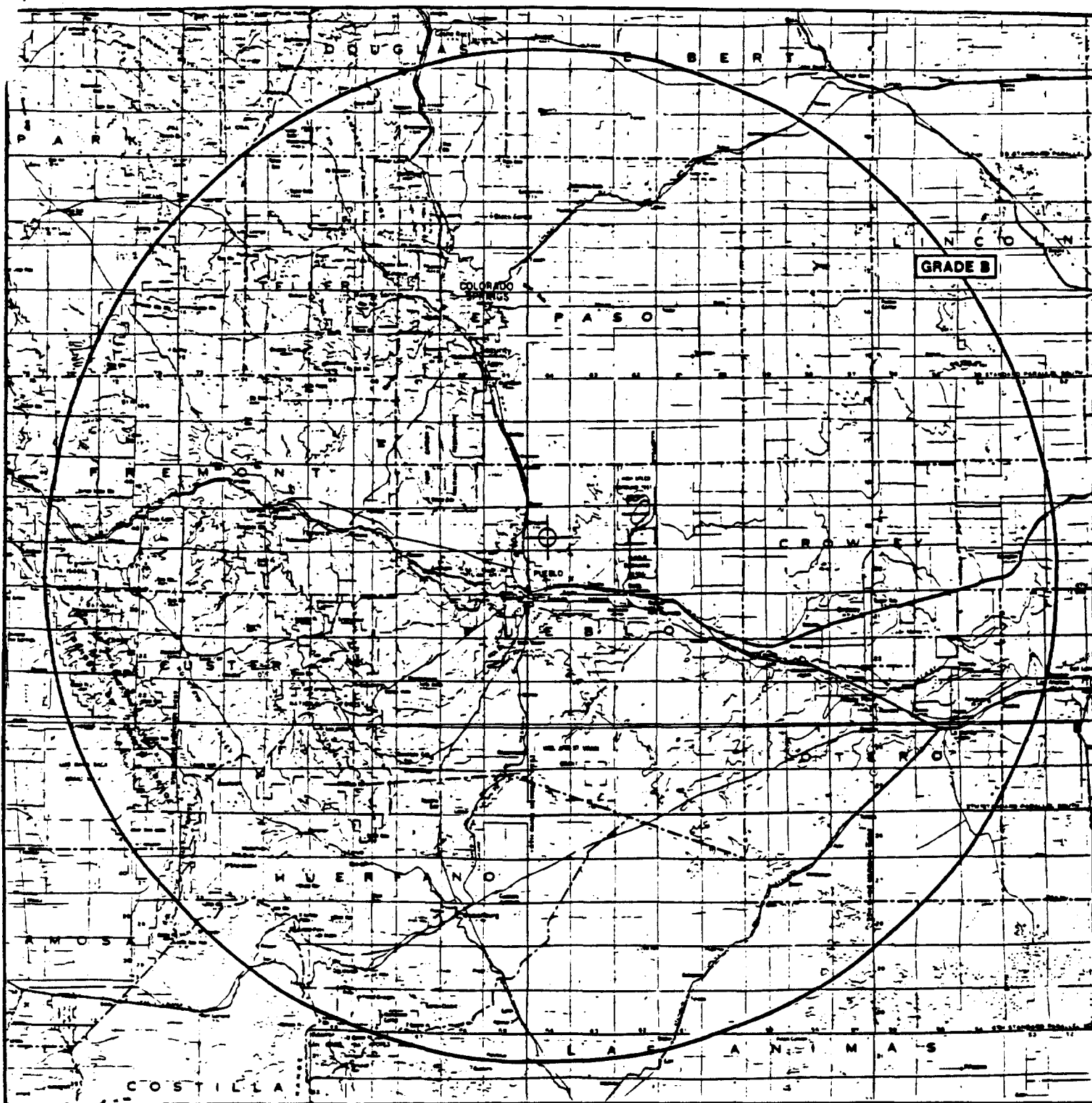
^{2/}ibid.

^{3/}There is shadowing in Denver from the KTSC(TV) CP on Cheyenne Mountain and thus the actual populations within this contour are inflated and were not intended to be served.

^{4/}Serves Colorado Springs from Cheyenne Mountain and is within the computed Grade B contours of the present and proposed operation of KOAA-TV and KTSC(TV).

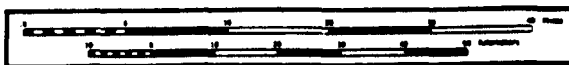
^{5/}Considered insignificant by FCC in granting the KSTV(TV) construction permit.

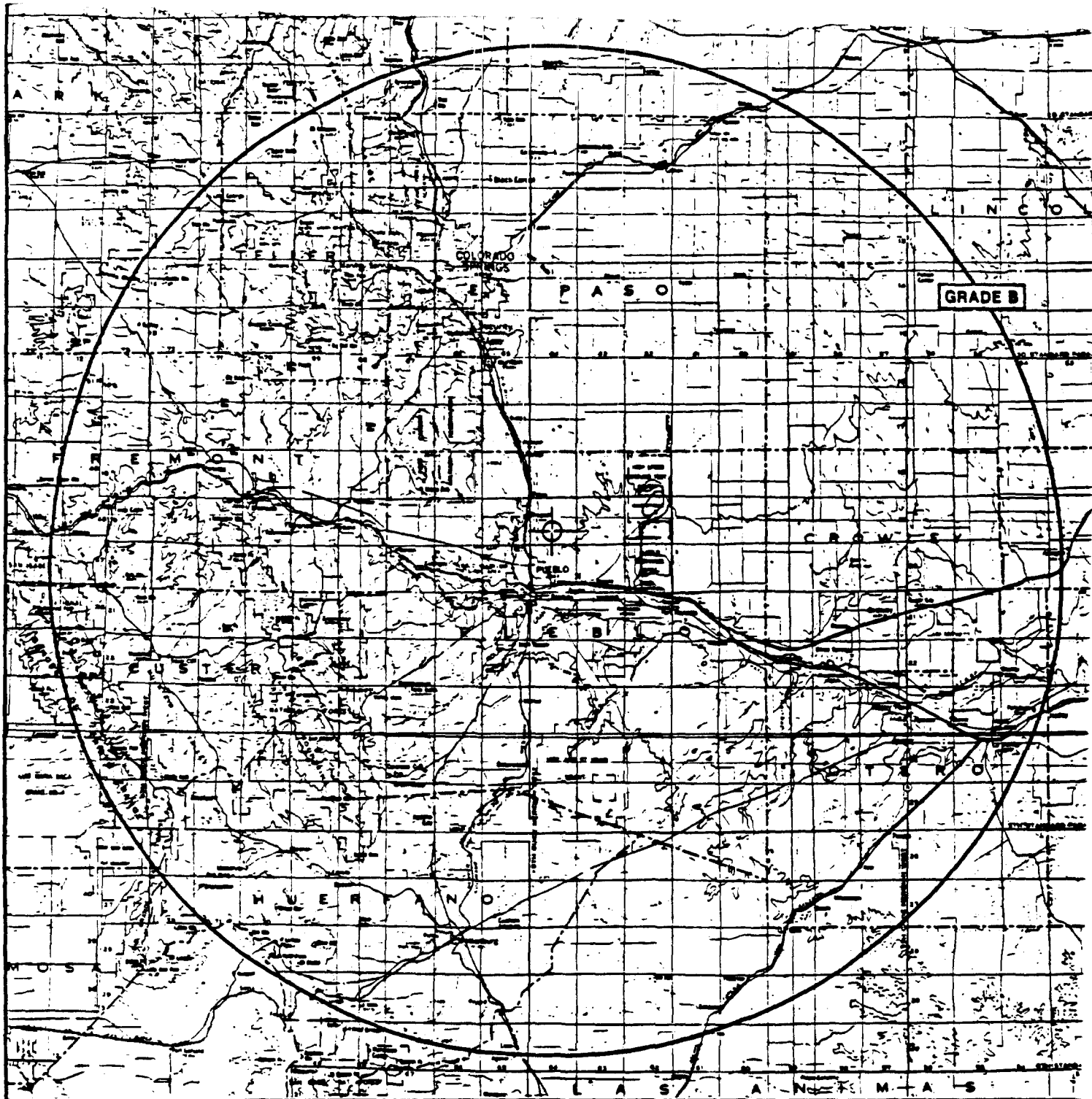
K15BX	STA	74 dBu contour	128,627
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COMPUTED COVERAGE CONTOUR
KOAA-TV, PUEBLO, COLORADO
CHANNEL 5 100 KW 396 METERS
AUGUST 1992

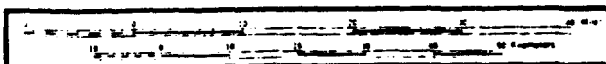
COHEN, DIPPELL and EVERIST, P.C. Consulting Engineers Washington, D.C.

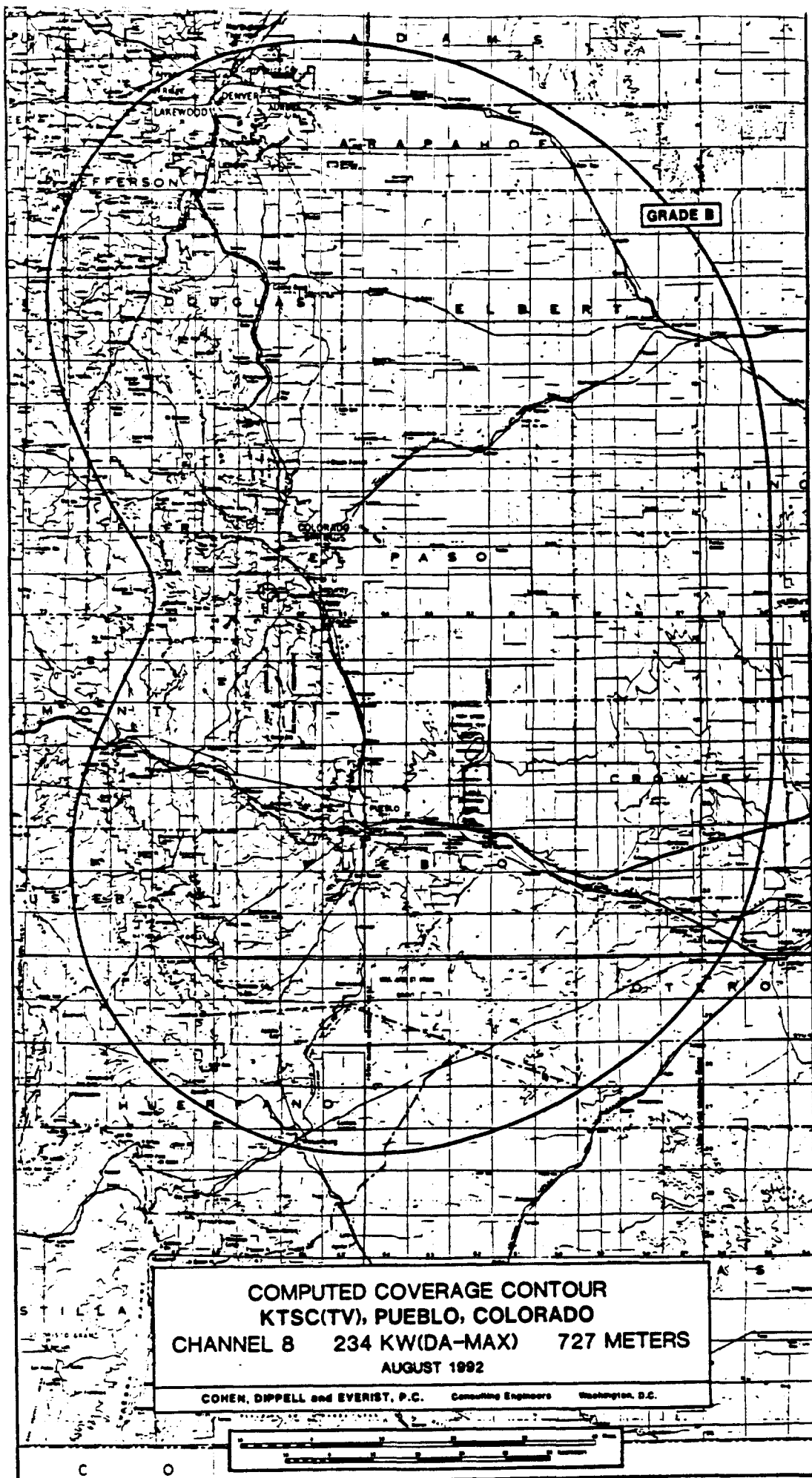




COMPUTED COVERAGE CONTOUR
KTSC(TV), PUEBLO, COLORADO
CHANNEL 8 316 KW 372 METERS
AUGUST 1992

COHEN, DIPPELL and EVERIST, P.C. Consulting Engineers Washington, D.C.





COHEN, DIPPELL AND EVERIST, P. C.

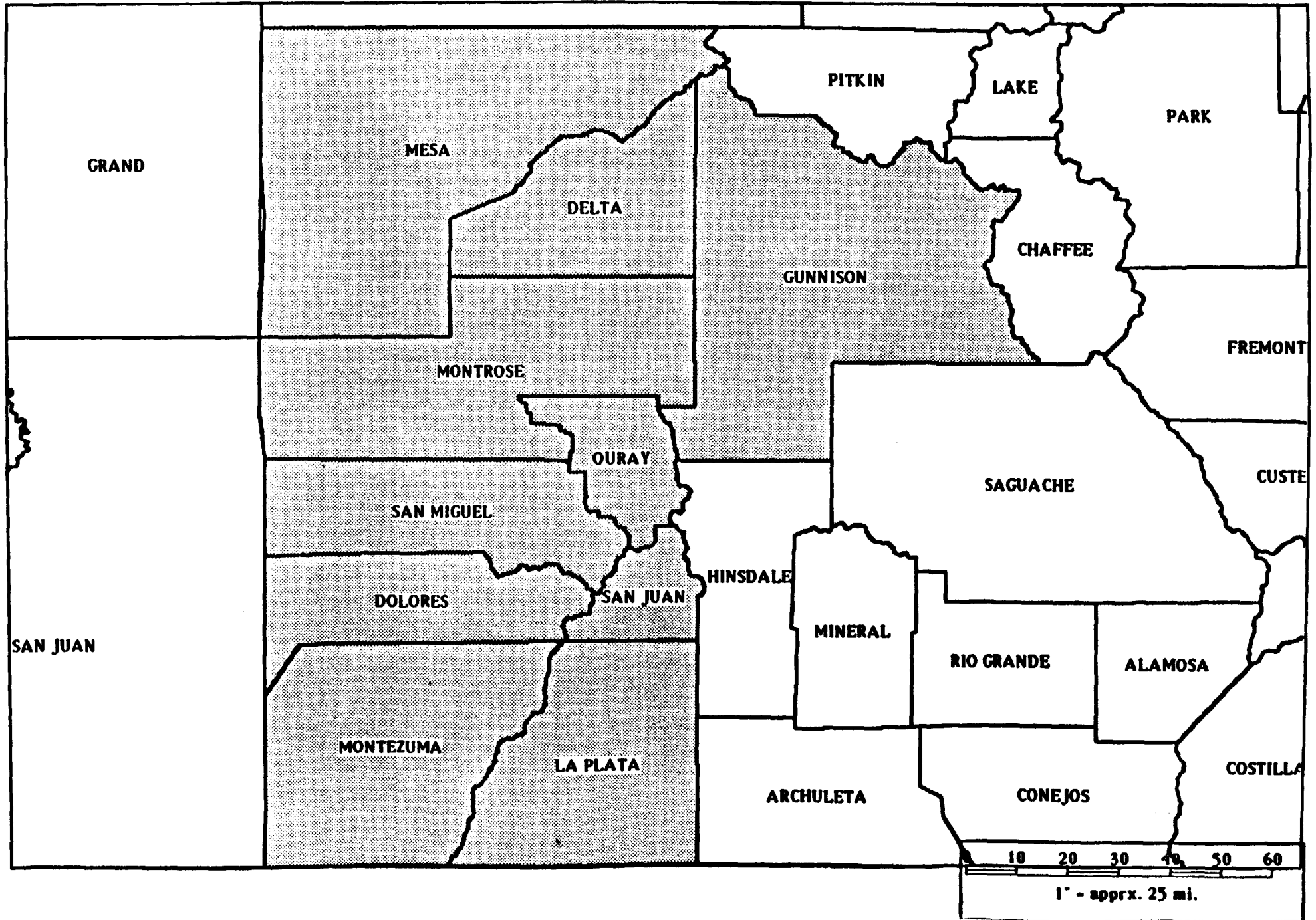
APPENDIX A

COHEN, DIPPELL AND EVERIST, P. C.

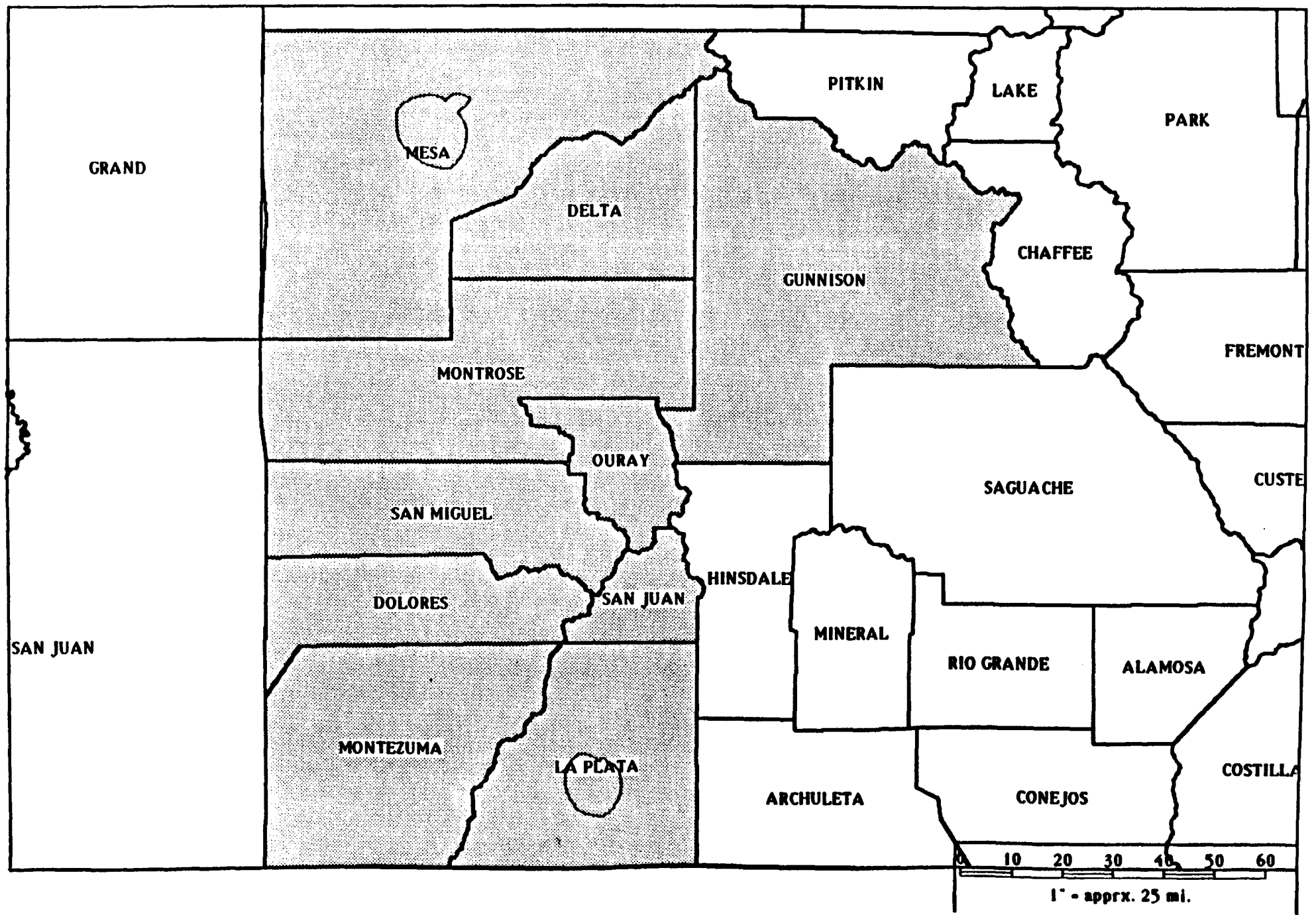
PROPOSED SERVICE TO WESTERN COLORADO
FROM EXPANSION OF KTSC-TV TRANSLATOR SYSTEM
SEPTEMBER 1992

<u>County</u>	<u>Population</u>	<u>Translator Service</u>
Mesa	93,145	65,995
Delta	20,980	none
Montrose	24,423	
Ouray	2,295	none
San Miguel	3,653	none
Dolores	1,504	none
San Juan	745	none
Montezuma	18,672	none
La Plata	32,284	16,876
Gunnison	10,273	none
TOTAL	207,974	82,871

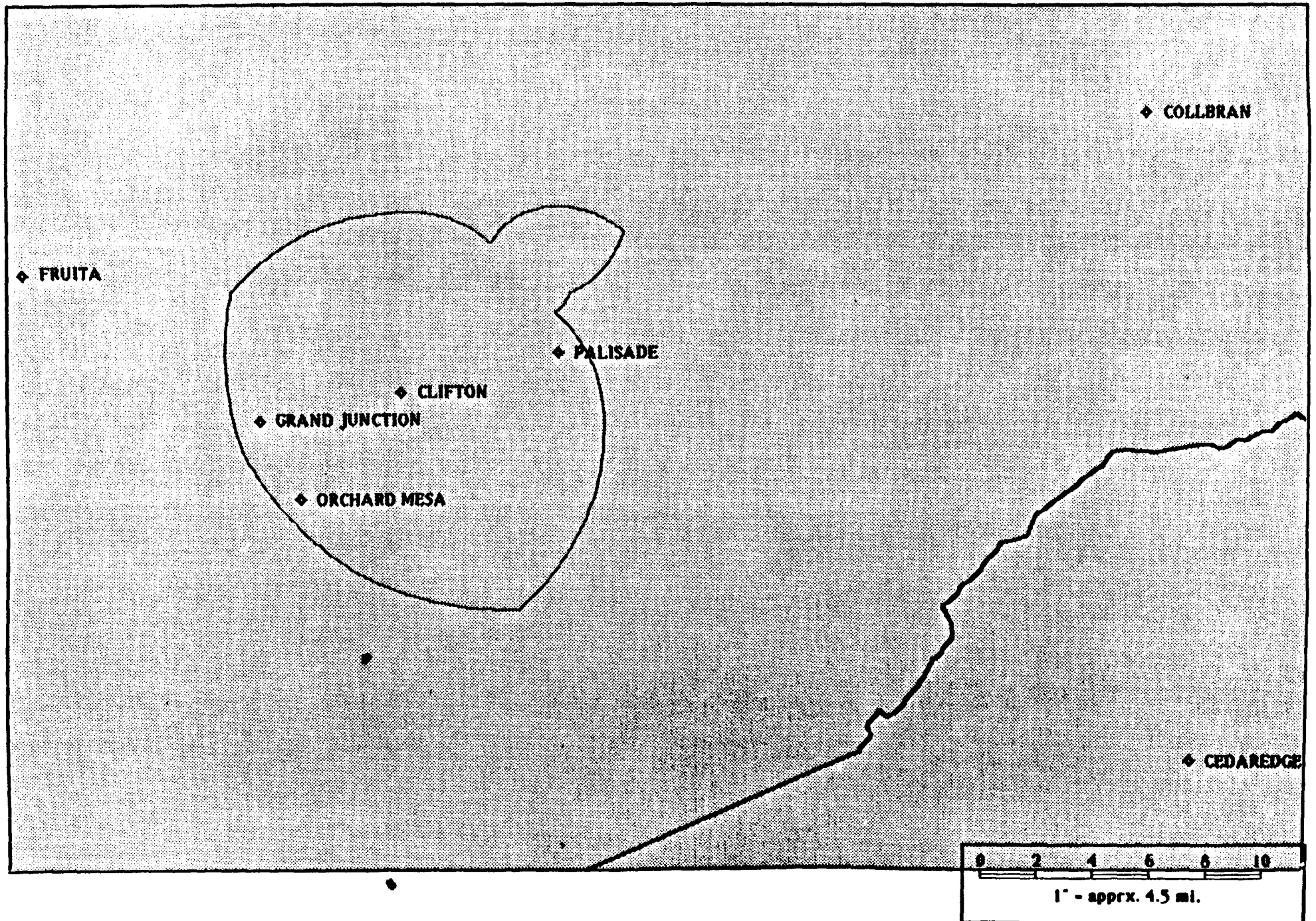
KTSC-TV ADDITIONAL COUNTIES - WESTERN COLORADO



KTSC-TV ADDITIONAL COUNTIES - WESTERN COLORADO



KTSC-TV TRANSLATOR AT GRAND JUNCTION



KTSC-TV TRANSLATOR AT DURANGO

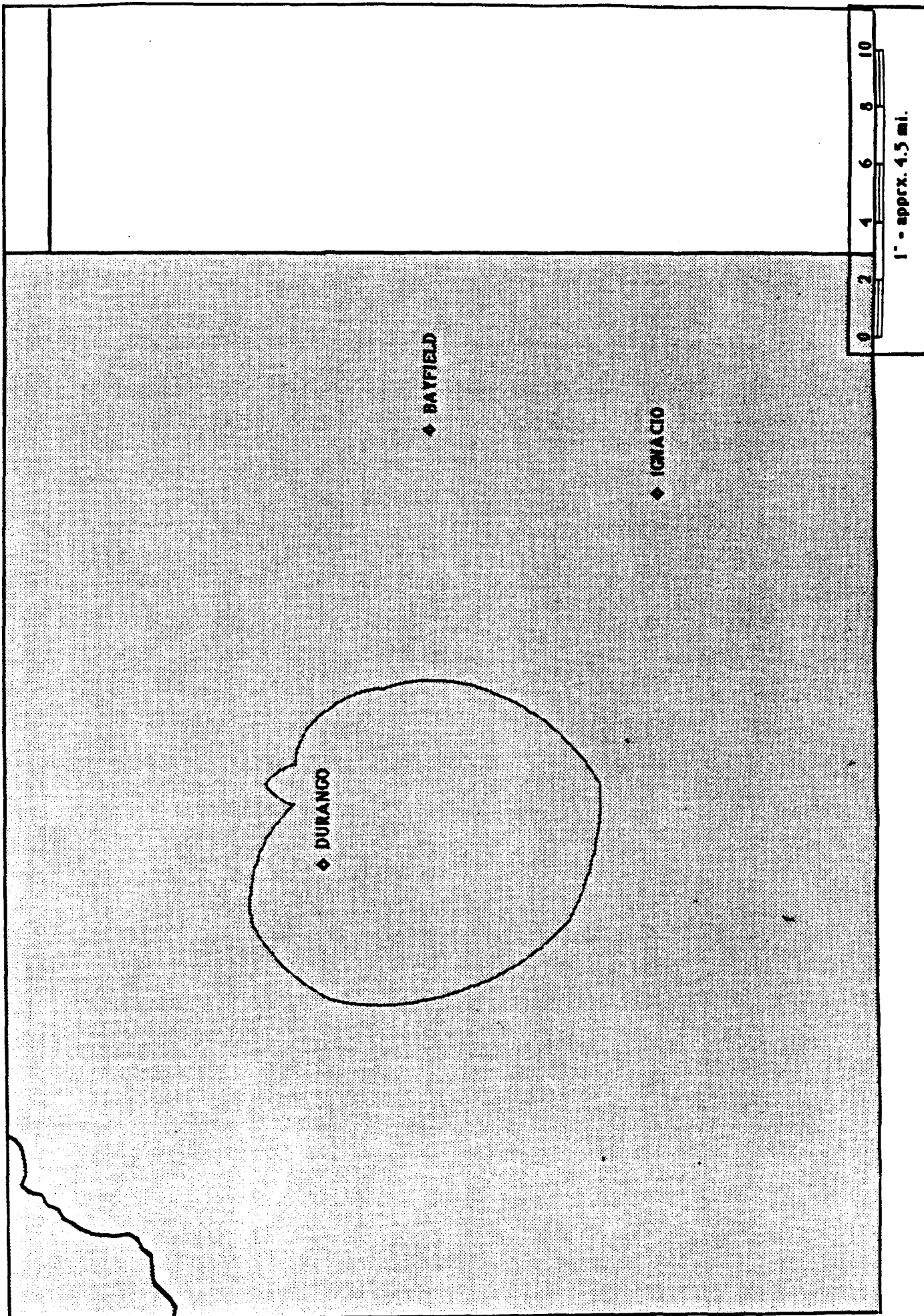


EXHIBIT C

**ENGINEERING STATEMENT
IN SUPPORT OF
APPLICATION FOR REVIEW OF
MM DOCKET NO. 93-191
ON BEHALF OF
THE UNIVERSITY OF SOUTHERN COLORADO
AND SANGRE DE CRISTO COMMUNICATIONS, INC.**

AUGUST 1995

**COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.**

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

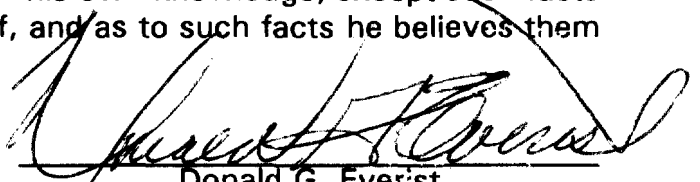
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

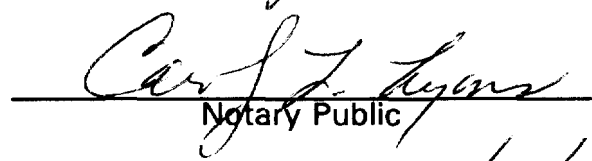
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 14th day of August, 1995.


Notary Public

My Commission Expires: 5/28/98

The following engineering statement has been prepared on behalf of the University of Southern Colorado ("USC") and Sangre de Cristo Communications, Inc. ("KOAA") in support of their Application for Review of the Report and Order in MM Docket No. 93-191¹.

According to the latest FCC published information, there are currently 2,267 licensed VHF translators and 2,539 licensed UHF translators throughout the United States. In Colorado alone, there are a total of 617 UHF and VHF licensed translators.²

The important role of the translator in Colorado is well established.³ The number of licensed translators in the State has grown and it is clear that translators are an integral part and logical extension of primary television service in the state. Translator service is particularly important in Colorado because the mountainous terrain in the state blocks full service television signals from reaching remote communities. Translators are the only means of ensuring that television signals reach the particularly remote and mountainous areas of Colorado. Tables 1, 2 and 3 demonstrate that the State of Colorado relies heavily on translator service. Colorado has only 27 licensed full service television stations but has 617 licensed translators.

¹ Adopted June 30, 1995 and released July 14, 1995

² By contrast, Colorado has 23 licensed commercial and 4 licensed noncommercial full service stations which represent 2% of the total 1,176 commercial TV stations and 1.1% of the total 363 noncommercial stations in the U.S. respectively.

³ See Appendix A and B, Notice of Inquiry, Docket No. 78-253, adopted August 8, 1978, 68FCC 2D, Page 1525, and Final Rule BC Docket 78-253, FCC 82-107 adopted March 4, 1982.

An assessment has been made of whether translators proposed by USC and KOAA would be displaced by full service television operations. Potential translator frequency availability was analyzed for USC's proposed translator operations for the communities of Colorado Springs, Grand Junction, Cortez-Red Mesa, Durango, and Ignacio, Colorado and for KOAA's proposed translator operations for the communities of La Junta, Cheraw, La Veta, Cannon City, and Villa Grove, Colorado.

USC Translators

As indicated in Tables 4 and 5, there are no full service television stations or vacant allotments which would preclude continued operation of K30AA at Colorado Springs and USC's proposed translator for Channel 60 at Cortez-Red Mesa.

USC's proposed Channel 21 translator at Grand Junction would be displaced by a noncommercial educational station operating on Channel 18 at Grand Junction (application currently pending) and the vacant Channel 22 allotment at Montrose, Colorado (see Table 6). USC can build and operate its proposed Channel 21 translator until such time that Channel 18 or Channel 22 are licensed. The prospect of finding another frequency for Channel 21 are good depending on the circumstances presented at that time.

USC's proposed translator operation on Channel 29 at Durango would be displaced if a full service station became operational on Channel 15 at Farmington, New Mexico or on Channel 33 at Durango (see Table 7). A translator operating on Channel 15 at Ignacio also would be displaced by a full service station operating on

Channel 15 from Farmington or Channel *20 at Durango (see Table 8). Nevertheless, Channel *20 is allotted to Durango and could be used by USC as a satellite of KTSC(TV) to provide service to both Durango and Ignacio.

KOAA Translators

Our analysis of the translator operations proposed by KOAA revealed that KOAA's operation of translators on Channel 29 at Canon City and Channel 26 at Villa Grove would not be precluded by any existing operational stations or any full service allotments (see Tables 9 and 10). Although translator operation on Channel 22 at La Junta could be precluded by full service operation on Channel *22 (currently vacant), Channels 30, 43, 44, 57, 59 and 61 would be available for use by KOAA in this community (see Table 11).

KOAA's proposed translator for Channel 17 at Cheraw, Colorado would be displaced if a full service station became operational on either Channel *22 at La Junta or Channel 32 at Pueblo. If this were to occur, KOAA could use the same channels as those listed above for La Junta to serve Cheraw (see Table 12).

KOAA's proposed operation of Channel 16 from La Veta, Colorado would be displaced if a full service station commenced operations on Channel *16 at Alamosa, Colorado. As indicated on the attached Table 13, other available channels KOAA could use to serve La Veta include Channels 28, 29, 34, 45, 54, 58 and 64.

* Educational

COHEN, DIPPELL AND EVERIST, P. C.

TABLE 1
LICENSED VHF
TRANSLATORS
WITHIN STATE OF
COLORADO
AUGUST 1995

<u>Channel</u>	<u>Licensed</u>
2	35
3	21
4	28
5	15
6	25
7	26
8	26
9	34
10	27
11	26
12	23
13	29
Total VHF Translators	2,267
Colorado Translators	315
% of U.S. Total	13.9